

Subpart 6H

Autobody / Surface Coating

Mecklenburg County
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Air Quality Division

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NESHAP Subpart 6H

- 40 CFR 63.11169 – 11180
- Subpart HHHHHH—National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.



2 Types of Area Sources Subject to the Rule

Autobody Refinishing Shops

- Paint stripping with formulations using Methylene Chloride (MeCl).
- Spray painting of motor vehicles and/or mobile equipment.

Surface Coating Operations

- Spray painting metal and/or plastic parts/products using coatings that contain “Target HAPs”:

Chromium (Cr), Lead (Pb),
Manganese (Mn),
Nickel (Ni), or Cadmium (Cd).



Note for Autobody Shops

- You are subject to this rule when coating motor vehicles or mobile equipment regardless of Target HAP content. However, you may petition the Administrator for exemption from this rule if you can demonstrate that your spray coatings do not contain any Target HAPs.



The Rule Does Not Apply To:

- Surface coating or paint stripping at installations owned by the Armed Forces of the United States;
- Painting personal vehicles (no more than two per year);
- Research or laboratory activities;
- Quality control activities; or,
- Activities covered under another area source NESHAP regulation (A common example in Meck. Co. for coating sources is Subpart 6X – Metal Fabrication and Finishing).



Paint Stripping Requirements

- Implement management practices to minimize emissions of MeCl:
 - Evaluate the need for paint stripping;
 - Evaluate potential alternative stripping methods (without MeCl);
 - Optimize conditions to reduce MeCl evaporation; and,
 - Practice proper storage and disposal.



Spray Booth Requirements

- For motor vehicle painting:
Spray booths must be fully enclosed and ventilated at negative pressure or up to 0.05 inches of water positive pressure for sealed booths.
- For surface coating operations:
Spray booths must have a full roof, at least three complete walls or curtains, and ventilated at negative pressure.
- All booths must have filter technology to achieve at least 98% capture efficiency;



Spray Gun Requirements

- Coatings must be applied with a high volume low pressure (HVLP), electrostatic, airless, or air-assisted airless spray gun, or an equivalent technology.
- Gun cleaning must be completed so that all solvent spray is collected (No fumes or overspray escape during cleaning).



Painter Training Requirements

- Train/certify all painters on spray gun setup and maintenance and proper spray application.
- Training must include both hands-on and classroom instruction.
- Training must take place no later than 180 days after hiring.
- Training certifications are good for 5 years.



Notifications and Reports

- Initial Notification:
 - Existing Sources: deadline has passed.
 - New Sources: should submit within 180 days after startup.
- Notification of Compliance Status (NOCS):
 - Existing Sources: deadline has passed.
 - New Sources: as part of Initial Notification.
- Annual Notification of Changes Report:
 - submit by March 1 each calendar year if there are any reportable changes in your process.



Reportable Changes

- A “reportable change” means any change to previously submitted information including compliance methods or status.
 - Information that is now different than what was submitted in previous Initial Notification, NOCS, or Notification of Changes Reports.
 - Non-compliance (deviations) with rule requirements are reportable.



Recordkeeping Requirements

- Paint Stripping:
 - Maintain records of annual usage;
 - MeCl content of all stripping formulations (MSDS);
- All Coating/Painting:
 - Copies of Notifications/Compliance submittals;
 - Painter training certifications;
 - Spray Booth filter efficiency documentation;
 - Spray Gun transfer efficiency information;
 - Deviation and corrective action documentation.



More Information

- <http://www.epa.gov/airtoxics/6h/6hpg.html>
 - Rule Information, Technical Information and Implementation Tools.
 - Brochure.
- <http://daq.state.nc.us/toxics/areasources/subpart6h/>
- <http://airquality.charmeck.org>
 - Click on “Regulated Industry”
 - Look under the “Programs” section – “Paint Stripping and Surface Coating Operations (GACT 6H)”